

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
EASTERN DIVISION
CIVIL ACTION NO: 4:24-cv-00051-M-RN**

CYNTHIA B. AVENS, Plaintiff, v. FARIS C. DIXON, JR., DISTRICT ATTORNEY; VIDANT/ECU HEALTH MEDICAL CENTER; DR. KAREN KELLY, MEDICAL EXAMINER, Defendants.	DEFENDANT DR. KAREN KELLY'S MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT
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Under Rule 6(b) of the Federal Rules of Civil Procedure and Rule 6.1(a) of the Local Rules of Civil Procedure, Defendant Dr. Karen Kelly moves that the Court extend by thirty days her time to respond to Plaintiff's Complaint making her response due Wednesday, May 29, 2024. In support of this Motion, Defendant shows the following:

1. Plaintiff filed her Complaint on March 22, 2024.
2. Defendant was served with the Complaint on April 8, 2024, making her response due April 29, 2024.
3. Counsel for Defendant needs additional time to review, analyze, and research the claims and to prepare an appropriate response to Plaintiff's Complaint on Defendant's behalf.
4. Defendant does not seek this extension for any improper purpose.
5. Defendant requests a thirty-day extension, which will make Defendant's response due May 29, 2024.
6. Pursuant to L. R. Civ. P. 6.1(a), the undersigned counsel consulted with the Plaintiff about this Motion, and Plaintiff consents to the requested extension of time.

7. For these reasons, good cause exists for the requested extension of time.

WHEREFORE, Defendant requests that the Court extend by thirty days her time to file a response to Plaintiff's Complaint, making her response due May 29, 2024.

This 17th day of April, 2024.

JOSHUA H. STEIN

Attorney General

/s/ Jeremy D. Lindsley

Jeremy D. Lindsley

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Attorney for Dr. Karen Kelley

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **DEFENDANT'S MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT** with the Clerk of Court using the CM/ECF system and was served upon plaintiff by placing the same in the U.S. mail as follows:

Cynthia B. Avens
303 Riverside Trl
Roanoke Rapids, NC 27870
avens1@charter.net
Plaintiff (Pro Se)

This 17th day of April, 2024.

/s/ Jeremy D. Lindsley
Jeremy D. Lindsley
Assistant Attorney General